## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

HELEN MOODY, et al,	)
Plaintiffs,	) )
VS.	CIVIL ACTION NO.: 2:07cv318-WHA
ALLSTATE INSURANCE	)
COMPANY, et al,	)
Defendants.	) )

## **Affidavit of Catherine Keaton**

Before me, the undersigned notary public, personally appeared Catherine Keaton, who upon being duly sworn, testified as follows:

- 1. My name is Catherine Keaton. I am over nineteen (19) years of age and give this affidavit based upon my own personal knowledge.
- 2. On April 23, 2005, I was traveling in an automobile on Vaughn Road in Montgomery, Alabama. Shawn Dee Thornton was also traveling in an automobile on Vaughn Road. While operating his automobile he struck the vehicle I was traveling in. As a result of this accident, I suffered physical damages as well as pain and suffering.
- 3. As of January 11, 2008, I have incurred \$16,953.65 in medical expenses for treatment of the injuries I suffered as a direct result of the aforementioned accident.
- 4. I also incurred pain and mental anguish as a result of this accident. I will continue to suffer from pain and mental anguish as a direct result of this accident for the

foreseeable future. The damages for that suffering are equal to three times my medical expenses, or \$50,860.95.

The total amount of damage I have incurred as a direct result of this accident 5. is \$67,814.60.

I have read the above affidavit and swear and affirm that it is true and correct.

Catherine Keaton

Sworn to and subscribed before me this 15 day of January, 2008.

My Commission Expires: 12/29